

**EXHIBIT A**

Approved, SCAO

Original - Court  
1st Copy - Defendant  
2nd Copy - Plaintiff  
3rd Copy - Return**STATE OF MICHIGAN  
THIRD JUDICIAL CIRCUIT  
WAYNE COUNTY****SUMMONS**  
FEB 23 2021**CASE NO.  
21-002179-NO  
Hon. Annette J. Berry**

Court address : 2 Woodward Ave., Detroit MI 48226

Court telephone no.: 313-224-4679

Plaintiff's name(s), address(es), and telephone no(s)  
Jones, Larry et. Al**CITY OF DETROIT  
LAW DEPARTMENT  
LITIGATION SECTION**  
v  
City of DetroitDefendant's name(s), address(es), and telephone no(s).  
City of Detroit

Plaintiff's attorney, bar no., address, and telephone no

Frank K. Rhodes 24119  
19080 W 10 Mile Rd Fl 1  
Southfield, MI 48075-2400

**Instructions:** Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

**Domestic Relations Case**

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (form MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

**Civil Case**

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☐ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ \_\_\_\_\_ Court,

where it was given case number \_\_\_\_\_ and assigned to Judge \_\_\_\_\_.

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

**SUMMONS****NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date  
2/17/2021Expiration date\*  
5/19/2021Court clerk  
Sterling Harrison

Cathy M. Garrett- Wayne County Clerk.

\*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

MC 01 (9/19)

**SUMMONS**

MCR 1.109(D), MCR 2.102(B), MCR 2.103, MCR 2.104, MCR 2.105



STATE OF MICHIGAN  
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

LARRY JONES and  
D'SHAWN JONES,

Plaintiffs,

-vs-

CASE NO. 21- -NO

FLORA BLANDING, BAILEY RUMSCHLAG,  
PAUL SWEPPY, JAMES DEMPS, and CITY OF  
DETROIT, A Municipal Corporation, Jointly  
And/or Severally,

Defendants.

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FRANK K. RHODES, III (P24119)

Attorney for Plaintiffs  
19080 West Ten Mile Road  
Southfield, MI 48075  
(248) 350-0110 / Fax: 9170  
[FKRhodes49@gmail.com](mailto:FKRhodes49@gmail.com)

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There is no other pending or resolved civil  
action arising out of the transaction or  
occurrence alleged in the complaint.

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COMPLAINT

NOW COME the Plaintiffs by and through their attorneys, FRANK K. RHODES,  
III & ASSOCIATES, P.C. and in complaint against the defendants, states as follows:

1. That at all times herein mentioned, the Plaintiffs were residents of the County  
of Wayne and State of Michigan.
2. That at all times herein mentioned, the individual defendants were City of  
Detroit police officers and either lived in or conducted business in the County of Wayne

FRANK K. RHODES, III & ASSOCIATES, P.C. 19080 W. 10 MILE, FIRST FLOOR, SOUTHFIELD, MICHIGAN 48075 (248) 350-0110

21-002179-NO FILED IN MY OFFICE Cathy M. Garrett WAYNE COUNTY CLERK 2/17/2021 3:55 PM Sterling Harrison

and State of Michigan and the defendant, City of Detroit, is a municipal corporation existing and doing business in the County of Wayne and State of Michigan.

3. That on or about August 13, 2019 at 6:00 pm, the Plaintiffs were lawfully and prudently occupants of 10479 Duprey, Detroit, Michigan, and when exiting that house were chased by defendants Rumschlag and Sweppy for no reason and that thereafter, defendant Rumschlag tackled Plaintiff Larry Jones and arrested him for allegedly fleeing the police.

4. That thereafter, defendant Blanding individually and/or in conspiracy with the other individual defendant made and caused to be filed a false crime report alleging on August 13, 2019 at 6:00 pm, the Plaintiffs entered her home without permission and Plaintiff Larry Jones assaulted her and her daughter.

5. That thereafter, on/about August 14, 2019, Plaintiff D'Shawn Jones was arrested by members of the Detroit Police Department on the false claim of defendant Blanding and held in jail for several days before he was released without any charges.

6. That Plaintiff Larry Jones was prosecuted based upon the false charges initiated by defendant Blanding, acting in conspiracy with her co-defendants and at trial, Plaintiff Jones was exonerated.

7. That defendants Rumschlag and Sweppy had personal knowledge that the claims made by defendant Blanding were false and impossible.

8. That prior to August 13, 2019, defendants Demps and Blanding were command officers at the Detroit Police Department's Fifth Precinct and had negative personal dealings with the Plaintiff's mother and bore ill will and personal animosity toward her and the Plaintiffs and created the false claim of a serious felony against the Plaintiffs.

9. That it was the duty of the individual defendants to refrain from

- a. Touching, assaulting, or tackling the Plaintiffs without their consent or legal authority to do so;
- b. Filing, causing to be filed or conspiring to have filed a false and malicious complaint and prosecution against the Plaintiffs.
- c. Failing to object or condoning by silence or inaction the continuation of a false and malicious prosecution by a police officer, well knowing the allegations made were wrong, false and intentional.
- d. Detaining Plaintiffs except upon probable cause and/or a valid arrest warrant;
- e. Imprisoning and/or restricting Plaintiffs freedom and liberty without just and legal cause;
- f. Using racial and other epithets to threaten or discourage the plaintiffs from asserting their civil and constitutional rights and/or to ethnically intimidate them;
- g. Violating the rights afforded to the Plaintiffs by the Constitution of the United States of America, and
- h. Physically abusing Plaintiffs.

10. That notwithstanding the aforementioned duties, the individual defendants, and each of them violated each duty, knowing that the violation of each or every or all duties was/were substantially likely to cause an injury to a citizen such as the Plaintiffs, and did cause the Plaintiffs their injuries and damages as will further hereinafter be detailed.

11. That the defendant, City of Detroit, through its Police Department had a policy and practice of encouraging and permitting its officers to improperly suppress evidence and acquiesce in the presentation of false evidence in order to obtain warrants and convictions and



encouraged its police officers to refrain from honestly testifying that the evidence offered by other police officers was false so as to shield its officers from criminal or civil prosecution without punishment or re-training, all of the above encouraging its individual officers to violate the civil rights of its citizens, such as the plaintiffs herein.

12. That as a direct and proximate result of the intentional acts of the defendants, the Plaintiffs were caused to sustain injuries and damages, including, but not limited to fright, shock, loss of liberty outrage, mental anguish, humiliation, and mortification and that Plaintiffs allege that all of the foregoing injuries, losses, damages and conditions are painful, continuing and/or permanent.

13. That as a direct and proximate result of the intentional acts of the defendants, the Plaintiffs were caused to expend money in the defense of false charges, thereby sustaining a great loss.

14. That the amount in controversy as to each plaintiff exceeds the TWENTY-FIVE THOUSAND (\$25,000.00) DOLLAR jurisdictional limit of this court.

WHEREFORE, the Plaintiffs pray for damages against the defendants, and each of them, in an amount, which will fairly and adequately compensate them for their losses, as well as their interest, costs and attorneys fees as are provided by statute.

FRANK K. RHODES, III & ASSOC, P.C.

BY: /s/ Frank K Rhodes, III  
Frank K. Rhodes, III (P24119)  
Attorney for Plaintiffs  
19080 West Ten Mile Road  
Southfield, MI 48075  
(248) 350-0110

**SUMMONS**  
Case No. : **21-002179-NO**

**PROOF OF SERVICE**

TO PROCESS SERVER: You are to serve the summons and complaint not later than 91 days from the date of filing or the date of expiration on the order for second summons. You must make and file your return with the court clerk. If you are unable to complete service you must return this original and all copies to the court clerk.

**CERTIFICATE / AFFIDAVIT OF SERVICE / NONSERVICE**

☐ **OFFICER CERTIFICATE**

**OR**

☐ **AFFIDAVIT OF PROCESS SERVER**

I certify that I am a sheriff, deputy sheriff, bailiff, appointed court officer, or attorney for a party (MCR 2.104[A][2]), and that: (notarization not required)

Being first duly sworn, I state that I am a legally competent adult, and I am not a party or an officer of a corporate party (MCR 2.103[A]), and that: (notarization required)

☐ I served personally a copy of the summons and complaint.

☐ I served by registered or certified mail (copy of return receipt attached) a copy of the summons and complaint, together with \_\_\_\_\_

List all documents served with the Summons and Complaint

\_\_\_\_\_ on the defendant(s):

Defendant's name	Complete address(es) of service	Day, date, time

☐ I have personally attempted to serve the summons and complaint, together with any attachments, on the following defendant(s) and have been unable to complete service.

Defendant's name	Complete address(es) of service	Day, date, time

I declare under the penalties of perjury that this proof of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled \$	Fee \$	
Incorrect address fee \$	Miles traveled \$	Fee \$	Total fee \$

Signature \_\_\_\_\_

Name (type or print) \_\_\_\_\_

Title \_\_\_\_\_

Subscribed and sworn to before me on \_\_\_\_\_, \_\_\_\_\_ County, Michigan.  
Date

My commission expires: \_\_\_\_\_ Date Signature: \_\_\_\_\_  
Deputy court clerk/Notary public

Notary public, State of Michigan, County of \_\_\_\_\_

**ACKNOWLEDGMENT OF SERVICE**

I acknowledge that I have received service of the summons and complaint, together with \_\_\_\_\_ Attachments

\_\_\_\_\_ on \_\_\_\_\_  
Day, date, time

Signature \_\_\_\_\_ on behalf of \_\_\_\_\_